

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FAISAL G. KHALAF, Ph.D.,

Plaintiff,

vs.

Case No. 15-12604

FORD MOTOR COMPANY, a Delaware
Corporation, BENNIE FOWLER and
JAY ZHOU, jointly and
severally,

Hon. Marianne O. Battani

Defendants.

JURY TRIAL

BEFORE THE HONORABLE MARIANNE O. BATTANI
United States District Judge
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Tuesday, March 13, 2018

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1 This is my opportunity to preview for you what I
2 intend to show and what this case is about. It's about a
3 corporation and its managers that harassed, humiliated,
4 pushed out and ultimately fired Dr. Khalaf, a 17-year
5 employee with an outstanding performance record.

6 It is about two high-level Ford executives,
7 Mr. Fowler and Dr. Zhou, who are sitting at the table behind
8 me, who thought they could get away with denigrating
9 Dr. Khalaf who was not born in this country, because of his
10 English and his accent.

11 It is about arrogance. It is about a corporation
12 and its managers who have decided they are above the law and
13 that they could get away with punishing and marginalizing
14 Dr. Khalaf for bringing forward very legitimate harassment
15 and discrimination complaints and a corporation that betrayed
16 an earnest, honest, extremely hard working, impeccably
17 credentialed and well-reviewed leader.

18 I intend to show you that Dr. Khalaf was
19 discriminated against, harassed, retaliated against, subject
20 to a hostile work environment, and fired. He was kicked to
21 the curb by these defendants.

22 His treatment was so severe that he required a
23 yearlong medical leave for extreme workplace stress, which
24 his doctor you will hear attributes 100 percent to Ford Motor
25 Company.

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BEFORE THE HONORABLE MARIANNE O. BATTANI
United States District Judge
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Wednesday, March 14, 2018

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1 A. The first signature on top was Jay Zhou, on the left
2 below, David Cook, Bennie Fowler, Julie Lavender.

3 Q. And their titles are listed on here, obviously they are
4 director and VP-level people as well as defendant Jay Zhou,
5 correct?

6 A. Correct.

7 Q. How did you feel about being terminated from Ford Motor
8 Company?

9 A. Awful because that was always my dream, my career path,
10 my career goal, my career growth.

11 Q. You have attended many of the depositions in this case,
12 right?

13 A. Yes.

14 Q. Have you attended any court hearings?

15 A. I attended the court hearing and also Ford tried to have
16 Judge Battani dismiss this case.

17 Q. After being cut off from disability benefits from April
18 of 2015, what income did you have?

19 A. I had no income other than from Wayne State.

20 Q. No other paychecks coming in, correct?

21 A. No.

22 Q. How much were you earning for teaching at Wayne State
23 approximately?

24 A. Was about 7,500 per course a semester.

25 Q. Did your bills go away?

1 A. I'm sorry?

2 Q. Did your bills go away?

3 A. No, they did not.

4 Q. Did your house payments for you and your extended family
5 go away?

6 A. No. Actually my expenses got higher because I had to
7 fund my health treatment and recovery.

8 Q. Did your car payments go away?

9 A. No.

10 Q. Were you trying to find other work seeing what was going
11 on at Ford?

12 A. Yes.

13 Q. And you did get a job quickly, correct -- well, strike
14 that.

15 When did you start looking for a job?

16 A. I started looking for a job in 2015 as part of getting
17 myself acquainted with the industry in the field that I'm in.

18 Q. Okay. And you landed a job with BASF, correct?

19 A. Yes.

20 Q. At a higher salary?

21 A. Yes.

22 Q. Are you glad that you have a good job?

23 A. I'm glad that I have a job.

24 Q. Are there any negatives with respect to your current
25 employment situation?

1 A. My current job requires me to travel 50 and over percent
2 of the time across North America away from my family, and
3 also I have back pain situation where that is very hard for
4 me to be on the plane most of the time.

5 Q. When you talked about Ford trying to get the judge to
6 dismiss your case, what happened with that attempt?

7 MR. FORREST: Objection.

8 THE COURT: Sustained. Let's not go into that,
9 Counsel. That's improper.

10 BY MS. LAUGHBAUM:

11 Q. So I intend to present your economic damages through an
12 expert, but just tell me the types of damages, money damages
13 that you have incurred.

14 A. I incurred financial income damages, pain and suffering
15 for a long, long time.

16 Q. How about just focusing on not the emotional distress
17 side but actual, you know, money losses, out-of-pocket type
18 of losses, just the categories that you believe you have
19 been -- that you have sustained, categories of damages you
20 have incurred.

21 A. I have no retirement pension from BASF, and that was my
22 critical benefit and one of the primary reasons that everyone
23 wished all along to be covered in during retirement and
24 retirement healthcare. That's what we all work for is to
25 be -- have a peace of mind when we retire.

1 Q. Any other financial losses that you incurred?

2 A. I incurred no income basically for most of 2015.

3 Q. Okay. How about on the emotional distress side, what --
4 other than what you have already told us, what can you tell
5 us about the emotional distress claim that you are making as
6 far as how this affected you emotionally?

7 A. It affected me -- it's affecting me right now, and it is
8 never going to go away. That horrible treatment that I hope
9 and pray no one would have to experience and go through
10 because that stays with you for your whole life. It will --
11 I -- as much as I try to overcome, be positive, be
12 productive, I know I live it every single day with myself,
13 with my family, with my wife.

14 Q. Do you have a close family?

15 A. Yes, I do.

16 Q. Is family important to you?

17 A. Very important.

18 Q. Was it difficult telling your wife and your parents that
19 your career at Ford was gone?

20 A. Yes.

21 Q. So your father and your wife have been in the courtroom,
22 and I just didn't want to leave any doubt in the jurors' mind
23 about your relationship with your mother. What kind of
24 relationship do you have with your mother?

25 A. I have a wonderful and supportive relationship with my

1 mom both ways, and actually I stepped out and updated her on
2 what's going on, and she's praying for me.

3 Q. I'm sorry. Repeat that.

4 A. And she is praying for me.

5 Q. Why isn't she here?

6 A. She has asthma and when she gets emotional, that affect
7 her ability to breathe. She wanted to be with us, but I said
8 I care about you more than to be here. I'll try to follow up
9 with you on regular basis.

10 Q. Okay. So the jury has heard a lot from both of us --
11 well from you, maybe too much, but what can you say that you
12 haven't already conveyed about how your treatment by this
13 corporation and these defendants have impacted your life and
14 your family's life?

15 A. I am very sad. I always respected Ford Motor Company
16 and I had a wonderful career with Ford until Bennie Fowler
17 came on board in 2007, and from that point on the pain and
18 suffering never, never went away.

19 Q. Did you provide some documents to our damages expert so
20 he could help calculate his estimation of your losses?

21 A. Yes.

22 Q. And were those -- what were those documents?

23 A. Those documents were financial incomes from when I was
24 at Ford and today at BASF.

25 Q. Including tax returns?

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BEFORE THE HONORABLE MARIANNE O. BATTANI
United States District Judge
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Thursday, March 22, 2018

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1 A. Yes.

2 Q. Can you put that up, please -- you know, you don't need
3 to bother with that.

4 So, just for the record, that's Defendant's 208.
5 The jury has seen it many times.

6 Did you obtain the signatures from the necessary
7 people at Ford for plaintiff to be offered the SIRP package
8 at the time he refused to take a job back at Ford?

9 A. Yes.

10 Q. And had he accepted this package, it would have been
11 something like the CTP, there would have been some money
12 involved?

13 A. Yeah. I think it was six months or something at the
14 time.

15 Q. And he would have had to sign a release to take the
16 money and avoid all of this litigation?

17 A. Yes.

18 Q. Okay. And he refused to sign the release and avoid the
19 litigation?

20 A. Yes.

21 Q. So he left without the money?

22 A. Yeah. It was a choice that he made.

23 Q. Okay. All right. So plaintiff testified that if he had
24 returned to Ford in September 2015 when he was offered a job,
25 that he would not have had a pension anymore with Ford, he

1 would not have been able to continue participating in the
2 pension plan in accruing additional retirement benefits. Is
3 that correct?

4 A. No.

5 Q. All right. He also testified that had he come back to
6 Ford in September 2015, he would have started over with the
7 new Ford service date of 2015 as opposed to his original
8 service date of 1999; is that correct?

9 A. No.

10 Q. All right. Let's go back in time to April 2014 when you
11 were attempting to meet with plaintiff, you and Jay Zhou,
12 Dr. Jay, about performance issues.

13 Can you put up, please -- we want to run through
14 this very quickly -- D133. I just want to establish the
15 timeline for the jury. All right.

16 So what is that?

17 A. It appears to be a note from Faisal -- oh, Jay had a
18 meeting scheduled with him on -- a one-on-one, and Faisal is
19 postponing it because it conflicted with a meeting that he
20 had.

21 Q. Okay. Can you put up D --

22 A. And that was April 1st.

23 MS. HARDY: Your Honor, I move to admit D133.

24 THE COURT: Any objection?

25 MS. LAUGHBAUM: It's already up. Is this what we

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BEFORE THE HONORABLE MARIANNE O. BATTANI
United States District Judge
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Monday, March 26, 2018

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1 working -- let's say, if the employee is working elsewhere --
2 give me one moment please.

3 Generally the Court is required to determine
4 whether or not front pay is appropriate if the employee is
5 not working elsewhere, and it's for the jury to then
6 determine the amount that's appropriate.

7 I don't think that analysis even applies here. My
8 client is working somewhere else, and the question is his
9 future pay simply relates to the pension losses that
10 Dr. Paranjpe blackboarded.

11 So if the Court agrees that the jury is entitled to
12 assess pension -- you know, look at pension losses, which I
13 presume is the case, then the question for them is how much
14 is it. I don't think there is any question for the Court on
15 this front pay issue, and specifically pension.

16 THE COURT: So what are the economic damages to the
17 present time?

18 MS. LAUGHBAUM: He has -- all of his economic
19 losses, Judge, are future; they are like post-retirement
20 losses.

21 THE COURT: So we take out A in the first one.

22 MS. LAUGHBAUM: Right. I mean, he did have some
23 initial losses but they are -- you know, I guess in theory
24 the Court could -- the jury could find he had past losses --
25 you know, there are documented blackboarded losses on

1 find punitive damages.

2 MR. DAVIS: That will be allowed, Your Honor? And
3 then we have actually agreed on a punitive damage instruction
4 prior to -- when we had our conversation last week or two
5 weeks ago.

6 THE COURT: Okay.

7 MR. DAVIS: So we have that.

8 MS. LAUGHBAUM: I thought we had too, Mr. Davis,
9 although the last version you sent me didn't have sort of THE
10 bullet points about the reprehensibility of the defendants'
11 conduct, et cetera, et cetera.

12 MR. DAVIS: Yeah, it got cut off. I'm trying to
13 learn PowerPoint.

14 MS. LAUGHBAUM: But nothing's changed as far as
15 what we agreed to?

16 MR. DAVIS: Nothing's changed. I will figure out
17 the PowerPoint issue and present that.

18 MS. LAUGHBAUM: I think we are down to the verdict
19 form, Your Honor.

20 MR. DAVIS: The verdict form.

21 THE COURT: Let's me just pull that out. Now, is
22 this form of verdict plaintiff's?

23 MS. LAUGHBAUM: We both submitted one. Mine has
24 about 10 questions, defendants' has about 20.

25 MR. DAVIS: I submitted a new verdict form last

1 night, and that has seven questions on it.

2 THE COURT: I'm sorry. What?

3 MR. DAVIS: We submitted a new verdict form this
4 morning at 8:00 a.m., it came in through the ECF utilities.

5 MS. LAUGHBAUM: I don't have that.

6 MR. DAVIS: It should be in the stack that the
7 clerk handed you a while back after the special instructions.

8 THE COURT: Let me find it.

9 MR. DAVIS: Your Honor, if you have our verdict
10 form --

11 THE COURT: You know what, I had it but I don't see
12 it here. Oh, yes, I do, but you said you submitted a new one
13 and it is the new one I don't have.

14 MR. DAVIS: I have the copy your clerk gave me,
15 Your Honor. I can hand you the paper copy and work off my
16 electronic copy, if that helps.

17 THE COURT: Okay. Just one minute before you
18 start. I'm going -- my secretary is going to send you -- I'm
19 just looking at the standard instructions. These are the
20 standard instructions which will have to be tweaked for this
21 case. Okay?

22 MR. DAVIS: Yes, Your Honor.

23 THE COURT: No, this isn't right. When I get off
24 the bench I will go find mine, and I will get them to send
25 this to you.

1 MR. DAVIS: Yes, Your Honor.

2 THE COURT: Okay.

3 MR. DAVIS: Your Honor, so we submitted this new
4 form which I think greatly simplifies what are very
5 complicated issues, and I think the form of it is more or
6 less consistent, with a few tweaks, as to the Court's rulings
7 today. I think this form is easy to follow. It really
8 specifies which claims are being brought against which
9 people, which would be helpful if the Court were to throw out
10 some of the claims on directed verdict. The remaining
11 claims, whatever the rulings were, would be preserved there,
12 which could be helpful. And, again, it is five questions and
13 then two damages questions, and we think this captures really
14 what the Court was getting at.

15 THE COURT: Okay. I'm just looking at the damages
16 ones now. We have to take out --

17 MR. DAVIS: Swap out backpay with pension losses, I
18 believe, Your Honor.

19 THE COURT: Yes, right. Okay. And I have
20 plaintiff's verdict form.

21 Plaintiff, do you have defendants' new verdict
22 form?

23 MS. LAUGHBAUM: I'm just looking at it now. Your
24 Honor, it's certainly simplified from the last version.

25 A couple of things, instead of repeating has

1 plaintiff proved by a preponderance of the evidence again and
2 again and again, I would think it would be simpler to just
3 say did defendant demote, blah, blah, blah, as explained in
4 the jury instructions, rather than, you know, phrase it in
5 that way.

6 Also with respect to the hostile environment claim,
7 they have got it broken out subordinates and supervisors. I
8 don't see that as a proper analysis. The analysis is you
9 look at the totality of the circumstances, the totality of
10 the work environment, and determine whether or not the
11 plaintiff was subjected to a hostile environment. You don't
12 separate it and segment it into was point A a hostile work
13 environment, was point B a hostile work environment? Was A
14 plus B a hostile work environment? So that I think should be
15 whittled down or condensed rather.

16 THE COURT: Let's stop there. Let's just take a
17 look at that. Okay. I agree, we've got preponderance of the
18 evidence on all of these so the standard is the same.

19 MR. DAVIS: Your Honor, the standards are different
20 however for coworker versus supervisory, and, again, it may
21 be -- it may be -- this is one of the key things in the DV
22 and I know you don't want us to argue that now, but obviously
23 Dietlin's testimony was not allowed in where she made what we
24 said was a foundationless claim about a discriminatory
25 comment. All we have in this case is for the coworkers;

1 there's nothing about his accent. I'm not going to get into
2 the DV motion, but really they should be separated out
3 because there are different standards. And if the Court were
4 to grant DV on the subordinates at a minimum we could just
5 cut that out completely. So I think keeping them separate
6 for the record is important to find out what was the basis.
7 What did the jury thinks was discriminatory, right, Your
8 Honor? Because if they think that the generic hostility from
9 Miller or whatever was -- they marked that off, well, then
10 that's an argument that we don't to have redo the trial on
11 appeal, the Court can say that gets thrown out.

12 So keeping these separate in light of the very
13 different legal standards and the very different types of
14 evidence that have been presented here I think is critical
15 for preserving this record.

16 MS. LAUGHBAUM: I don't agree. You don't look at
17 hostile work environment in a vacuum; you look at the
18 totality. And either they are going to find that overall it
19 was hostile or it wasn't, and --

20 THE COURT: I think it is important to look at
21 whether it was the subordinates in this case or his
22 superiors, so I will allow it in this case. I will take out
23 though has plaintiff proved by a preponderance of the
24 evidence. There is only one standard, preponderance of the
25 evidence, in all of these, so we can just say -- I think the

1 easiest thing to say is --

2 MS. LAUGHBAUM: Do you find?

3 MR. DAVIS: Or just has plaintiff proved? We can
4 take out the preponderance phrase there -- the clause.

5 MS. LAUGHBAUM: I would propose either do you find
6 or did any defendant discriminate -- or did any defendant
7 retaliate, et cetera, et cetera --

8 MR. DAVIS: Well, Your Honor, the standard --

9 MS. LAUGHBAUM: -- as explained in these
10 instructions.

11 MR. DAVIS: The plaintiff having to prove is the --
12 that's the essence of the claim, and it is simple enough; if
13 you just say has plaintiff proved that he was subjected --

14 THE COURT: I would take out by a preponderance of
15 the evidence. Has plaintiff proved that he has demoted or
16 terminated?

17 MR. DAVIS: Is that in those two instructions or
18 across the board?

19 THE COURT: Across the board. Even in the next
20 line by a preponderance of the evidence. You don't keep
21 having to repeat that.

22 MR. DAVIS: Okay.

23 MS. LAUGHBAUM: One other point, Your Honor. It
24 appears we are going basically with the defendants' revised
25 form. Under discrimination national origin, both questions

1 one and two, I'm not alleging Zhou demoted Khalaf, and I'm
2 not alleging, yeah, on either of those. So I think that
3 should -- I don't even want there to be a blank for them to
4 address that issue; either say not applicable or plaintiff
5 does not make that -- this claim as to Zhou.

6 THE COURT: Okay. You are not making the claim of
7 demotion by Fowler?

8 MS. LAUGHBAUM: No, Zhou.

9 THE COURT: I mean Zhou, so here we will just say
10 not applicable.

11 MR. DAVIS: Just N/A or should I write the whole
12 words not applicable, Your Honor?

13 THE COURT: Yes, just to make sure they understand
14 what we are saying. Anything else?

15 MS. LAUGHBAUM: Give me one moment, please. I
16 think maybe the punitive should be fleshed out a little more.

17 THE COURT: One minute here. Let me see. Well, I
18 think we ought to have another question on punitive. Is
19 plaintiff entitled to punitive damages? Yes. Then what's
20 the amount?

21 You sound here like you are asking for an amount.
22 How much? I mean, you do say if any, but I think that's not
23 significant enough.

24 MR. DAVIS: So 7, that says punitive damages, yes
25 or no; and then 8, that has the amount?

1 THE COURT: Right.

2 MR. DAVIS: Yes, Your Honor.

3 MS. LAUGHBAUM: And do we need the language in
4 number 5, if you answered no to all five questions, you are
5 finished? That's fine. And then it says your verdict is for
6 the defendants. Do we need that your verdict is for the
7 defendants?

8 THE COURT: Where are you?

9 MS. LAUGHBAUM: Bottom of second page, last thing
10 under question 5.

11 THE COURT: If you answer no to all five questions,
12 you are finished. Your verdict is for the defendants,
13 otherwise continue. Yes, I like that in there because I want
14 them to be clear.

15 MS. LAUGHBAUM: Okay.

16 THE COURT: That the --

17 MS. LAUGHBAUM: Actually, the more I think about
18 it, I guess that's fine.

19 THE COURT: Yeah.

20 MS. LAUGHBAUM: Okay. And then under damages we
21 are going to say is plaintiff entitled to an award of
22 punitive damages. Should it say as explained in these
23 instructions, or is that unnecessary?

24 THE COURT: I think that's not necessary because
25 every one of these questions are as explained in the

1 instructions.

2 MS. LAUGHBAUM: Okay. And this is improper -- I'm
3 sorry. This says nonpunitive damages. Okay. I'm sorry. So
4 last page, damages, that should just say --

5 THE COURT: The standard instruction says
6 compensatory damages, that's the word that's used.

7 MR. DAVIS: I can change that.

8 THE COURT: Not nonpunitive but compensatory.

9 MS. LAUGHBAUM: But what they are asking -- it is
10 not backpay, it is --

11 THE COURT: We are taking that out and saying
12 pension and health-related benefits.

13 MS. LAUGHBAUM: Retiree health benefits, and then
14 emotional distress damages. Can we say that?

15 THE COURT: If you want.

16 MS. LAUGHBAUM: Let me look back at the other
17 language we have used on that.

18 MR. DAVIS: We are fine with that change, Your
19 Honor.

20 THE COURT: 7, you have punitive damages-Ford?

21 MR. DAVIS: Yes, Your Honor.

22 THE COURT: Why do you have just Ford when you
23 asked for them against Fowler and Zhou?

24 MR. DAVIS: No, we have it for all three, Your
25 Honor.

1 THE COURT: I know, but if you look -- take out the
2 Ford.

3 MR. DAVIS: Take that out, yeah.

4 MS. LAUGHBAUM: I don't think we need the if any,
5 if any, if any four times in question number 17.

6 MR. DAVIS: I thought Your Honor just ruled that
7 was appropriate but not sufficient, that's why we are adding
8 a new instruction?

9 THE COURT: Yeah, we are adding another
10 instruction.

11 MS. LAUGHBAUM: Oh, right, we are inserting is
12 plaintiff entitled as a threshold.

13 THE COURT: Right.

14 MS. LAUGHBAUM: And then we go to 7, but we are
15 still saying four different times if any, if any, if any, if
16 any, suggesting repeatedly, you know --

17 THE COURT: First of all, we can take out -- if
18 they get to this question because you will have to instruct
19 them if they say yes, is plaintiff entitled to punitive
20 damages, that will be question number 7. If yes, you answer
21 question 8, which is now our 7. And then you will say how
22 much. You don't take out if any for that first one because
23 they've already said there will be damages. But then when
24 you go to Ford, Fowler and Zhou, you leave the if any because
25 they may not find punitive damages against them individually.

1 Do you follow what I just said?

2 MR. DAVIS: I do, and it is also possible they
3 could find some but not all defendants in question 7 were
4 awarded punitives and they shouldn't have been awarded if
5 they didn't answer yes in the previous section, so, yeah, I
6 would agree with that, Your Honor.

7 MS. LAUGHBAUM: And then it says aware instead of
8 award.

9 MR. DAVIS: I changed that already.

10 THE COURT: Anything else on the instructions?

11 MS. LAUGHBAUM: I don't believe so, Your Honor.

12 THE COURT: Now, I want you to go over these. You
13 are entitled to lunch, you can go to lunch. But I want you
14 to go over them, and I know, Mr. Davis, you have a lot to do
15 to put it into PowerPoint, but I want you to go over the
16 wording of the individual instructions again together because
17 tomorrow morning we are starting closing arguments at 9:00,
18 so we don't have time to do instructions. So if there's any
19 disputes, I need to know about it today.

20 MS. LAUGHBAUM: You will be here this afternoon,
21 God forbid?

22 THE COURT: I will be in all afternoon. I have a
23 hearing from 3:00 to 4:30. I hate to keep you until after
24 that, but if necessary we will. We will go until we have
25 these instructions done.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FAISAL G. KHALAF, Ph.D.,

Plaintiff,

vs.

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JAY ZHOU, jointly and
severally,

Hon. Marianne O. Battani

Defendants.

JURY TRIAL

BEFORE THE HONORABLE MARIANNE O. BATTANI
United States District Judge
Theodore Levin United States Courthouse
231 West Lafayette Boulevard
Detroit, Michigan
Tuesday, March 27, 2018

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1 of Personnel Relations, it is signed by Global Quality and
2 New Model Launch GVP, Global Vice President, and our
3 Defendant Bennie Fowler.

4 So Ford came in here and with a straight face told
5 you, oh, he wasn't fired, there was no adverse action, he
6 wasn't fired.

7 Judge Battani, you might recall, asked a few
8 questions directly of Mike Lank, the HR manager, when he was
9 on the stand, and elicited that well, yes, because the offer
10 was for a demotion and he didn't take it, his separation was
11 involuntary. Ford also said, well, we offered him money to
12 leave. So then the follow-up question was, well, does Ford
13 offer money to people who just quit? And the answer was no.

14 So Ford's coming into court, despite all of that,
15 saying we never terminated him. Shame on you, Ford. Shame
16 on you.

17 Let me talk a little bit about BASF. The company
18 is going to say, oh, he just jumped ship because he had this
19 great opportunity at BASF. Well, you know what, he had an
20 offer that he didn't take. He didn't accept that
21 September -- I believe it is a September 1st offer. And then
22 BASF came back and said, you know what, Dr. Khalaf is a great
23 catch, we are going to sweeten the pot. They offered him
24 more money, and he -- and that job offer was September 4th.
25 He was terminated by Ford September 1st.